

EXHIBIT A

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DESHEILA C. HOWLETT,

Plaintiff,

v.

**CIVIL NO. 17-11260
Hon. Terence G. Berg
Mag. R. Steven Whalen**

**CITY OF WARREN; COMMISSIONER JERE
GREEN, acting in his individual capacity; LT.
LAWRENCE GARDNER; SHAWN
JOHNSON; DAWN MCLANE; BARBARA
BEYER; ANWAR KHAN; DARRIN LABIN;
WILLIAM ROSS; KEVIN BARNHILL;
PAUL HOUTOS; SCOTT TAYLOR**

Defendants.

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AFFIDAVIT OF GREGORY A. MURRAY

STATE OF MICHIGAN)

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COUNTY OF MACOMB)

I, Gregory A. Murray, being first duly sworn, state that the following is true and accurate to the best of my knowledge and belief, and if called to testify will state the following:

1. I am an African American male.
2. I served as the Diversity Coordinator for the City of Warren from January 6, 2017 to December 8, 2017, approximately 11 months.
3. During that period of time, I developed the opinion that the City of Warren was vulnerable to federal intervention and oversight due to its history of, and the outcomes associated with, racially discriminatory employment practices.
4. In my opinion, the Mayor of the City of Warren, Mayor Fouts, is tone deaf and disingenuous, (i. e. not genuinely interested in adopting practices necessary to address racial diversity within city government), and is afraid to, and will not take the necessary steps to, reverse racially discriminatory employment practices within city government.
5. In my opinion, the Police Commissioner, Jere Green, was not an advocate of diversity and was comfortable with the lack of diversity within the ranks of the Warren Police Department.
6. The City of Warren has a history of taking delayed disciplinary action after its employees engaged in racially discriminatory and otherwise racially inappropriate conduct.
7. Although Barbara Beyer admitted responsibility for her repeated use of the racially derogatory word, "Nigger," in the presence of Officer Desheila Howlett, no definitive disciplinary action was imposed against her until several weeks after the incident. I participated in meetings where the purpose of the meeting was to discuss disciplinary action regarding Ms. Beyer's behavior. Subsequently, disciplinary action that I recommended



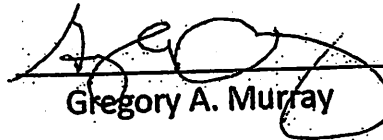
against Beyer included an unpaid two-week suspension that was imposed only after she had received her annual longevity (bonus) check.

8. Mayor Fouts stated to me that Police Commissioner Jere Green was not interested in diversity and that Commissioner Green told Fouts that blacks couldn't pass the necessary tests or the background investigation in order to become police officers with the city of Warren.
9. After the Barbara Beyer incident, wherein Beyer repeatedly used the racially derogatory word "Nigger" in Officer Desheila Howlett's presence, the Police Commissioner and other city officials held a meeting wherein they discussed strategies for discrediting Desheila Howlett after she filed her lawsuit against the City of Warren.
10. In writing, I asked Mayor Fouts to fully fund the Office of Diversity with proper resources and staff in order be effective in implementing diversity programs within the city of Warren and he denied the request.
11. Mayor Fouts told me on more than one occasion that diversity would be placed on the back burner for two years until after the 2019 Mayoral election for the city of Warren. This decision greatly concerned me. I made attempts to meet with the Mayor to discuss this matter, but he avoided doing so.
12. When I attempted to organize a diversity committee within city government, Mayor Fouts directed me to stop because people on the committee had called for his resignation and further that he feared a backlash from the White residents of the City of Warren if the city aggressively promoted racial diversity. Mayor Fouts expressed to me that he did not believe the climate in Warren was ready for racial diversity within the workforce.
13. A regulatory training of appointees was conducted and video recorded wherein Mayor Fouts made disparaging comments about people with Tourette's syndrome. Mayor Fouts ordered me to destroy the recordings of that training. I partially complied.
14. On October 24, 2017, I gave Mayor Fouts my resignation letter in an attempt to force Mayor Fouts to re-commit to a program of diversity within the city of Warren. On November 9, 2017, the Mayor Fouts rejected my resignation letter, and asked me to stay on. I agreed to do so, and considered the issues associated with the reason for the submission of my resignation resolved and closed.

15. Thereafter, I continued my efforts to fully implement diversity within the City of Warren governmental departments. I made written recommendations to the Mayor regarding next steps in identifying and applying best practices relative to advancing diversity within Warren's municipal workforce. The Mayor rejected every recommendation.

16. It is my opinion that Mayor Fouts hired me as the city's Diversity Coordinator as window dressing and merely a political calculation, to give a false impression that he and the city government was interested in abating discrimination based on race within Warren city government. I could not accept this facade, which is what motivated me to resign in October 2017.


FURTHER AFFIANT SAYETH NOT


Gregory A. Murray

Subscribed and sworn (or affirmed) before me,

this 17th day of January, a Notary Public

in and for Wayne County, State of Michigan acting in Macomb County


(signature)
Notary Public

My Commission expires on 03/14/22

